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**From:** Bohan, Suzanne [bohan.suzanne@epa.gov]  
**Sent:** 8/21/2018 11:32:03 PM  
**To:** Benevento, Douglas [benevento.douglas@epa.gov]; Thomas, Deb [thomas.debrah@epa.gov]  
**CC:** Moon, Diane [Moon.Diane@epa.gov]; Bohan, Suzanne [bohan.suzanne@epa.gov]  
**Subject:** FOR ACTION - Final Review of ECOS/EPA - Final Comments due August 23  
**Attachments:** Compliance Assurance Workgroup Draft 1.0 August 17 2018.docx; Compliance Assurance WG List\_August 17 2018.docx

Doug and Deb –

Late last Friday, the ECOS/EPA Compliance Assurance Workgroup on which I participate finished our draft paper on improving compliance assurance activities in the context of cooperative federalism. Patrick Traylor and Jim Macy from Nebraska are planning to discuss the paper at next week's ECOS meeting. Yesterday morning, Patrick circulated the draft document to Regions and asked for any showstoppers / fatal flaws. Patrick's email follows.

I would appreciate your review of the attached document and would be happy to answer any questions you may have. My apologies for the short turnaround request.

Thank you,

Suzanne

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**From:** Gargas, Toni  
**Sent:** Monday, August 20, 2018 7:08 AM  
**To:** Enforcement Division Directors <Enforcement\_Division\_Directors@epa.gov>; Regional Counsel Contacts <Regional\_Counsel\_Contacts@epa.gov>  
**Cc:** Enforcement Coordinators <Enforcement\_Coordinators@epa.gov>; Chu, Ed <Chu.Ed@epa.gov>; Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** FOR ACTION - Final Review of ECOS/EPA - Final Comments due August 23

Good Morning –

Below is message from Patrick Traylor on the long awaited, much anticipated joint ECOS/EPA paper on improving compliance assurance activities in the spirit of cooperative federalism. Five regions have been very involved in the drafting of the document along with 5 state commissioners from the other five regions. However, Patrick would like to give the Regions one-last chance to make any **show stopper comments** on the document. Please review the document and send any showstopper thoughts/comments to Sarah LaBoda or Toni Gargas by 5:00pm CDT on Thursday, August 23, 2018.

Ed Chu will also be sending this document out to the DRAs for their review as well.

Thank You,  
Toni Gargas

Good Morning,

As many of you know, for the past year ECOS and EPA have been working together to articulate how EPA and the states could improve compliance assurance activities in the context of cooperative federalism. The workgroup is comprised of representatives (either state or EPA) from each EPA region, and has now completed its work. The attached document is a summary of the workgroup's work, which has been endorsed by all the workgroup members. As you would expect, the document was heavily negotiated by EPA representatives from five regions and OECA. We expect the document to be considered by Susan Bodine for several purposes, including eventually finalizing her January 2019 interim guidance.

The workgroup co-chairs, Jim Macy from Nebraska and Patrick Traylor, plan to summarize the workgroup's efforts on August 28 at ECOS' fall meeting. The EPA workgroup members asked us to circulate the document to the regions and solicit feedback on any fatal flaws in the document that would make it unwise for EPA to communicate publicly that it supports the document.

Please let Toni Gargas or Sarah LaBoda know if you find have any fatal flaws that you see in the document no later than **5:00 p.m. CDT on August 23**.

Thank You,

**Patrick Traylor**

Deputy Assistant Administrator

Office of Enforcement and Compliance Assurance

U.S. Environmental Protection Agency

(202) 564-5238 (office)

(202) 809-8796 (cell)

**Toni Gargas**

**Lead Region Coordinator for the Office of Enforcement and Compliance Assurance**

**US EPA, Region 7**

**Enforcement Coordination Office**

**11201 Renner Blvd.**

**Lenexa, Kansas 66219**

**913-551-7193**